

Exhibit A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**STIPULATION AND AGREED ORDER REGARDING
UNSEALING OF CERTAIN MATERIALS FILED IN CONNECTION WITH
THE NAS CHILDREN AD HOC COMMITTEE’S RULE 2004 MOTION AND REPLY**

Purdue Pharma L.P. and certain of its affiliates that are debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) and the NAS Children Ad Hoc Committee (the “**NAS Committee**”) (together with the Debtors, the “**Parties**”), by and through their undersigned counsel, hereby stipulate and agree as set forth below in this stipulation and agreed order (the “**Stipulation**”).

Recitals

A. On December 15, 2020, the NAS Committee filed under seal its motion seeking discovery from the Debtors, pursuant to Bankruptcy Rule 2004, along with supporting exhibits and material (the “**Rule 2004 Motion**”).² On December 18, 2020, the Debtors filed their

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² See *The NAS Children Ad Hoc Committee’s Motion Entry of Order Pursuant to 11 U.S.C. §§ 105(A) and 107(B) and Fed. R. Bankr. P. 9018 Authorizing the Filing of Certain information and Exhibits Under Seal in Connection* (...continued)

objection to the NAS Committee's Rule 2004 Motion.³ The Debtors and the NAS Committee met and conferred on December 21, 2020, and reached an agreed path forward with respect to the NAS Committee's Rule 2004 Motion, which was conveyed to this Court on December 22, 2020.⁴

B. On March 19, 2021, the NAS Committee filed under seal its reply in further support of the Rule 2004 Motion, along with supporting exhibits and material (the "**Rule 2004 Reply**").⁵ On April 1, 2021, the Debtors filed their statement in response to the NAS Committee's Rule 2004 Reply and the McClammy Declaration.⁶

C. On June 7, 2021, in accordance with the Third Amended Protective Order,⁷ the NAS Committee sent the Debtors an email challenging the designation of certain documents, most of which the NAS Committee filed under seal in connection with its Rule 2004 Motion and Rule 2004 Reply (the "**Challenge Notice**"). On June 11, 2021, the Debtors responded to the

(continued....)

with the NAS Children Ad Hoc Committee's Ex Parte Motion Requesting a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006 (Dec. 15, 2020), Dkt. No. 2139.

³ See *Debtors' Objection to the NAS Children Ad Hoc Committee's Motion Entry of Order Pursuant to 11 U.S.C. §§ 105(A) and 107(B) and Fed. R. Bankr. P. 9018 Authorizing the Filing of Certain information and Exhibits Under Seal in Connection with the NAS Children Ad Hoc Committee's Ex Parte Motion Requesting a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006* (Dec. 18, 2020), Dkt. No. 2155.

⁴ See *Declaration of James I. McClammy in Support of the Debtors' Statement in Response to the Reply of the NAS Children Ad Hoc and Supplemental Declaration in Further Support of its Request for Entry of a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006*, Ex. 10 (Apr. 1, 2021), Dkt. No. 2585 (the "**McClammy Declaration**").

⁵ See *The NAS Children Ad Hoc Committee's Motion Entry of Order Pursuant to U.S.C. §§ 105(A) and 107(B) and Fed. R. Bankr. P. 9018 Authorizing the Filing of Certain information and Exhibits Under Seal in Connection with the Reply and Supplemental Declaration in Further Support of NAS Children Ad Hoc Committee's Ex Parte Motion Requesting a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006* (Mar. 19, 2021), Dkt. No. 2538.

⁶ See *Debtors' Statement in Response to the Reply of the NAS Children Ad Hoc and Supplemental Declaration in Further Support of its Request for Entry of a Court Order Authorizing Examinations Pursuant to Federal rules of Bankruptcy Procedure 2004 and 9006* (Apr. 1, 2021), Dkt. No. 2584.

⁷ See *Third Amended Protective Order*, ¶ 65 (Nov. 12, 2020), Dkt. No. 1935.

Challenge Notice, offering to modify the designation of certain documents and explaining the basis of the designation for the remaining documents. On June 18, 2021, the NAS Committee sent a letter to this Court challenging the designation of the documents (the “**Challenge Letter**”), and on June 23, 2021, the Debtors submitted their response to the Challenge Letter.

D. On June 24, 2021, the Debtors and the NAS Committee agreed to continue to meet and confer regarding the issues raised by the NAS Committee in the Challenge Letter, obviating the need for this Court’s involvement. As a result of continued meet and confers, the Debtors and the NAS Committee have reached an agreement with respect to the unsealing of certain materials filed in connection with the NAS Committee’s Rule 2004 Motion and Rule 2004 Reply that are also the subject of the Challenge Letter.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. The NAS Committee may refile the following documents filed in connection with the NAS Committee’s Rule 2004 Motion and Rule 2004 Reply that are also the subject of the Challenge Letter in an unredacted form on the public docket on or after October 18, 2021:

- a. E513_00045970- Mundipharma Swedish SMPC- Opidol 6.17.03 Final Version
- b. E513_00046100- Mundipharma Swedish SMPC- Opidol 12-17-04
- c. PURCHI-000572404- Archival NDA 1994 Section E.3 Court Documents from the MDL/Prior Litigation
- d. PPLPRO01000394434- 2003 CCDS Revisions
- e. PPLPC028000094094- 10-2-03 Emails
- f. OAK0568468- 6/8/2000 Sackler Emails
- g. E01_00002130- Response to FDA Inquiries
- h. E513_00114030- Table for FDA Response

2. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation.

STIPULATED AND AGREED:

Dated: October 1, 2021
New York, New York

/s/ James I. McClammy

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*Counsel for NAS Children Ad Hoc
Committee*

SO ORDERED.

Dated: _____, 2021
White Plains, New York

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE